

1 (All parties and counsel listed on Signature Page)

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4 UNITED STATES DISTRICT COURT
 5 NORTHERN DISTRICT OF CALIFORNIA
 6 SAN FRANCISCO DIVISION

7 TAKEDA PHARMACEUTICAL CO., LTD.,
 8 TAKEDA PHARMACEUTICALS NORTH
 9 AMERICA, INC., TAKEDA
 10 PHARMACEUTICALS LLC, AND TAKEDA
 11 PHARMACEUTICALS AMERICA, INC.,

12 Plaintiffs,

13 v.

14 HANNA PHARMACEUTICALS, LLC,

15 Defendant.

16 Case No. 3:11-cv-00840 JCS

17 **STIPULATION AND [PROPOSED]
 18 ORDER REGARDING POST-MARKMAN
 19 SCHEDULE**

20 Judge: Hon. Joseph C. Spero
 21 Courtroom G, 15th Floor

22 TAKEDA PHARMACEUTICAL CO., LTD.,
 23 TAKEDA PHARMACEUTICALS NORTH
 24 AMERICA, INC., TAKEDA
 25 PHARMACEUTICALS LLC, AND TAKEDA
 26 PHARMACEUTICALS AMERICA, INC.,

27 Plaintiffs,

28 v.

29 ANCHEN PHARMACEUTICALS, INC., AND
 30 TWI PHARMACEUTICALS, INC.,

31 Defendants.

32 Case No. 3:11-cv-01609 JCS

33 TAKEDA PHARMACEUTICAL CO., LTD.,
 34 TAKEDA PHARMACEUTICALS NORTH
 35 AMERICA, INC., TAKEDA
 36 PHARMACEUTICALS LLC, AND TAKEDA
 37 PHARMACEUTICALS AMERICA, INC.,

38 Plaintiffs,

39 v.

40 IMPAX LABORATORIES, INC.,

41 Defendant.

42 Case No. 3:11-cv-01610 JCS

1 WHEREAS, the Court issued a Case Management and Pretrial Order on August 29, 2011,
 2 setting forth the schedule with respect to Claim Construction;

3 WHEREAS, the Court did not set post-*Markman* dates in its order of August 29, 2011;

4 WHEREAS, at the Claim Construction Hearing on February 16, 2012, the Court directed
 5 the parties to agree on a schedule for the remainder of pre-trial events;

6 WHEREAS, the parties, by their undersigned attorneys, hereby stipulate to the following
 7 schedule, subject to the approval of the Court:

Event	Date
Document Production Complete for Foreign-Language Documents	Monday, 04/30/12*
Document Production Complete for English-Language Documents	Tuesday, 05/15/12*
Fact Discovery Cut-Off	Friday, 07/27/12
Initial Expert Reports on Issues where party Bears Burden of Proof. Takeda will provide any report on secondary considerations at this time.	Friday, 08/24/12
Rebuttal Expert Reports	Friday, 9/21/12
Expert Discovery Cut-Off	Friday, 10/26/12
Last Day to File Dispositive Motions	Tuesday, 11/20/12
Oppositions Due for Dispositive Motions Filed on November 20, 2012	Friday, 12/21/12
Replies Due for Dispositive Motions Filed on November 20, 2012	Friday, 1/10/13
Motions Hearing	Friday, 02/01/13
Pretrial Conference	Friday, May 17, 2013 at 1:30 PM
Trial	June 3, 2013 at 8:30 AM
	March or April 2013

25 * The agreed-upon dates for the close of document production relate to documents produced in
 26 response to the comprehensive requests exchanged by the parties last year. The parties
 27 acknowledge that additional Requests for Production that are more narrow in scope, such as
 28 requests seeking individual documents or small populations of documents, may be issued between
 now and the close of fact discovery. Furthermore, this agreement is not intended to supersede the
 requirements of Rule 34 or other Federal Rules of Civil Procedure.

1 Respectfully Submitted,

2 DATED: March 21, 2012

3 TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA
4 PHARMACEUTICALS NORTH AMERICA, INC.,
5 TAKEDA PHARMACEUTICALS LLC, AND
6 TAKEDA PHARMACEUTICALS AMERICA, INC.

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31 PHARMACEUTICALS, INC.

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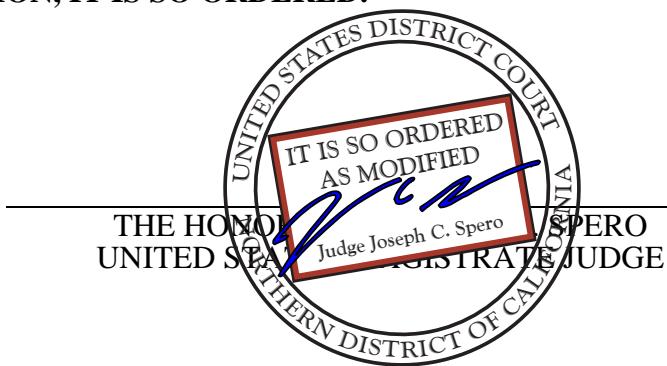
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17 IMPAX LABORATORIES, INC.
18

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 DATED: March 26, 2012



Filer's Attestation

I, Heather Takahashi, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING POST-MARLMAN SCHEDULE**. In compliance with General Order 45.X.B, I hereby attest that the other above-named signatory concurs in this filing.

DATED: March 21, 2012

/s/ *Heather E. Takahashi*